

The Honorable Lauren King

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

NO. 2:25-cv-00244-LK

SUPPLEMENTAL DECLARATION OF
TODD R. BOWERS IN SUPPORT OF
PLAINTIFFS' MOTION TO COMPEL

NOTE ON MOTION CALENDAR:
Wednesday, May 21, 2025

I, Todd R. Bowers, declare as follows:

1. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge.

2. I provided a declaration in support of Plaintiffs' Motion to Compel Discovery, Dkt. #275, which was filed in this matter as Dkt. #277. Everything in that declaration continues to be true and correct to the best of my knowledge.

3. Attached to this declaration as Exhibit A is a timesheet showing the number of hours worked and the tasks performed by individual staff members in preparing the motion and the reply in support of it. The timesheet was generated by having each staff member listed input their time into the timesheet. I have reviewed it, and it is consistent with my experience as a Deputy Attorney General and my understanding of the Washington State Attorney General

1 Office's policies and practices. I believe it to be a true and accurate accounting of the hours and
2 tasks performed in bringing the motion to compel discovery and the reply in support of it.

3 4. The hourly rates from my original declaration, multiplied by the total hours
4 worked shown in Exhibit A, is \$17,815.00. This is not a full account of the costs to the Attorney
5 General's Office to bring this motion. For example, this does not account for time spent
6 preparing for and participating in a meet-and-confer, nor for the work of other attorneys on the
7 team who reviewed and motion and reply and provided feedback prior to finalizing.

8 I declare under penalty of perjury under the laws of the State of Washington and the
9 United States of America that the foregoing is true and correct.

10 DATED this 21st day of May 2025 at Seattle, Washington.

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TODD R. BOWERS, WSBA #25274
14 Deputy Attorney General
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